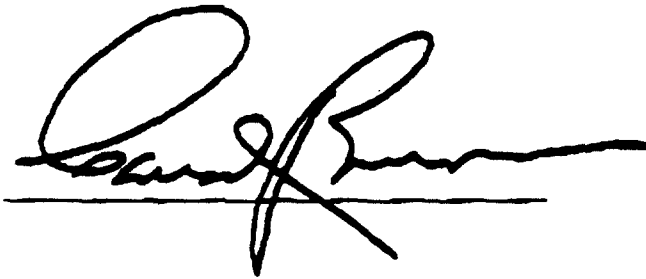


operating in less populated areas where access costs are a critical factor in the decision on whether to serve -- or abandon -- a particular area.

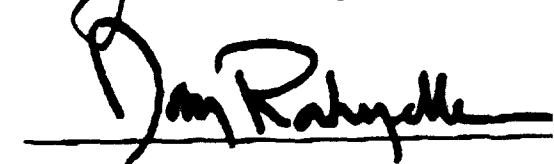
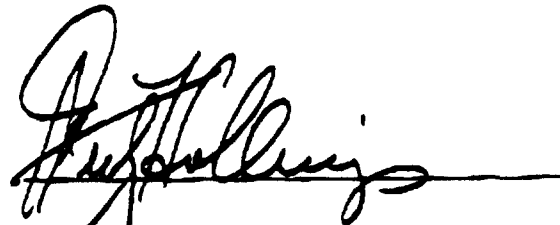
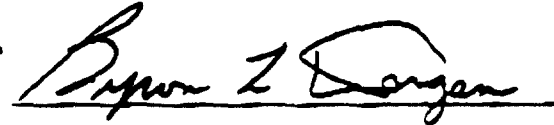
These are precisely the areas where competition has been slower to develop. Any policy change that threatens the competition that has been established in less populated areas must be carefully scrutinized. It was not the Senate Commerce Committee's intent that the Act be used to promote the interests of larger carriers over smaller ones. Moreover, we understand that the empirical data underpinning this dramatic change is tenuous, at best. It is our understanding that under the FCC's order, tandem transport rates are to be determined by an arbitrary and unverified revenue allocation, in contrast to other forms of access, which are based upon actual costs.

The non-urban businesses and residents who use the services of the smaller and medium-sized long distance carriers are now getting the carrier choice, service options, and innovations that many urban customers take for granted. Depriving these customers of such benefits in furtherance of an unnecessary and dubious access pricing change is directly contrary to the intent of Congress in enacting the 1996 Act. As the FCC reviews its order in the months ahead, we are hopeful that you will reconsider this potentially disastrous change and replace it with a switched access pricing system that continues to promote choice in all areas of the country.

Thank you for your attention to this matter.



Sincerely,



Henry

Richard H. Ryan

John Breau

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing **Comments of the Competitive Telecommunications Association** were served via first class mail, postage prepaid, this 18th day of August, 1997, to the following:

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